

**ORIGINAL**

August 19, 2008

Thomasenia P. Duncan  
Office of General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Christopher S. Morgan  
Clyde Hill, WA 98004

MUR # 6062

REC'D  
FEB 20 2009  
A 11:10

RECEIVED  
FEB 20 2009  
A 11:10

Dear Ms. Duncan:

The purpose of this letter is to file an official complaint with the Federal Election Commission against the Harry Truman Fund for violating Federal Election Campaign Laws. The Harry Truman Fund is a Political Action Committee, registered with the Public Disclosure Commission in the State of Washington.

The Respondents in this case are the Harry Truman Fund, Jason Bennett the Harry Truman Fund's Treasurer and George Scorola the Harry Truman Fund's Executive Director hereafter referred to as the "Respondents".

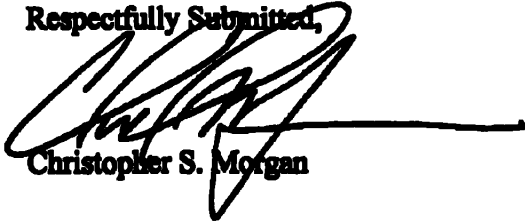
Washington's primary election is on August 19, 2008. Federal candidates appear on the primary ballot across the state, in each of Washington's nine congressional districts. In mid-August, the Harry Truman Fund engaged in federal election activity by distributing "get-out-the-vote" ("GOTV") mailers. A sample of the "get-out-the-vote" mailer is attached as Exhibit A. Both the language and the map contained in this piece of literature advocate for the election of federal candidates.

The GOTV activity in connection with a federal election is greatly in excess of the \$1,000 reporting threshold. This is clearly shown by the Harry Truman Fund's reports to the Washington Public Disclosure Commission. Printing costs for the GOTV mailing of over \$82,000 are reported, along with \$40,058 in postage, plus staff and consultant compensation. The Harry Truman Fund is not registered with the FEC and the source of its funds is almost entirely from prohibited sources. A copy of the Harry Truman Fund's Schedule A report filed with the Public Disclosure Commission on August 12, 2008 is attached as Exhibit B.

For the reasons stated above, the commission should find reason to believe pursuant to Federal Election Law, that the Harry Truman Fund committed multiple violations and the FEC should conduct an investigation into this matter.

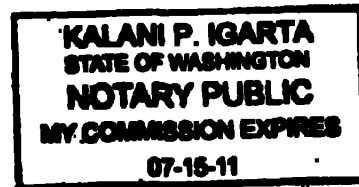
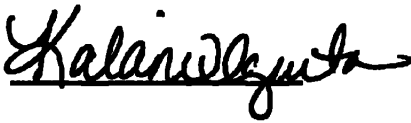
29044241003

Respectfully Submitted,



Christopher S. Morgan

Sworn to and subscribed to me this 19<sup>th</sup> day of August 2008.  
Notary Public in and for the State of Washington



My commission expires 7-15-11

29044241004

LCX 115017

**BAD REPUBLICAN POLICIES HERE**



**HAVE HURT FAMILIES HERE**

**Unhappily, Democrats in Washington State are leading the way.**

- ✓ A balanced budget, with record reserves.
- ✓ Economic policies that create family wage jobs, invest in clean energy technology and help small business.
- ✓ Real advancements in education, health care, for every child, and action on climate change.

**VOTE  
DEMOCRATIC IN 2008  
Your vote makes  
a difference for you, your  
family and your future!**

Exhibit A

# WHEN REPUBLICAN GEORGE W. BUSH ENTERED THE WHITE HOUSE:



2001: Gas was \$1.46/gallon  
TODAY: \$4.35/gallon

2001: Milk was \$2.90/gallon  
TODAY: \$3.89/gallon

2001: Federal surplus \$184 billion  
TODAY: Federal deficit \$410 billion

(source: gas.bls.gov)

(source: www.fda.gov)

(source: opo.senate.gov)

## HAD ENOUGH OF GEORGE W. BUSH AND REPUBLICAN POLICIES?

PAID FOR BY THE  
HARRY TRUMAN FUND

PO Box 9100  
Seattle, WA 98109



Printed

US Postage

PAID

Publishers Mailing

Service

90017247062

# Exhibit B

## CASH RECEIPTS AND EXPENDITURE

SCHEDULE  
to C4

A

100268016

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

HARRY TRUMAN FUND

08/12/2008

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
07/31/2008	15,000.00					
08/07/2008	39,000.00					

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ 54,000.00

CODES FOR CLASSIFYING EXPENDITURES: If one of the following codes is used to describe an expenditure, no other description is generally needed. The exceptions are:

- 1) If expenditures are in-kind or in-kind contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information on an attached sheet: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE  
DEFINITIONS  
ON NEXT PAGE

C - Contributions (monetary, in-kind & transfers)  
I - Independent Expenditures  
L - Literature, Brochures, Printing  
B - Broadcast Advertising (Radio, TV)  
N - Newspaper and Periodical Advertising  
O - Other Advertising (yard signs, buttons, etc.)  
V - Voter Signature Gathering

P - Postage, Mailing Permits  
S - Surveys and Polls  
F - Fundraising Event Expenses  
T - Travel, Accommodations, Meals  
M - Management/Consulting Services  
W - Wages, Salaries, Benefits  
G - General Operation and Overhead

3. EXPENDITURES

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below.
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
07/29/2008	EXPENSES OF \$50 OR LESS	A		\$ 0.00
07/30/2008	10TH LD DEMOCRATS PO BOX 1473 STANWOOD WA 982921473	G	JULY RENT 08	385.90
08/01/2008	30TH LD DEMOCRATS PO BOX 3268 FEDERAL WAY WA 980633268	G	CONTRIBUTION	4,000.00
08/01/2008	25TH LD DEMOCRATS PO BOX 372 PUYALLUP WA 983710039	G	CONTRIBUTION	4,000.00
08/04/2008	CHINOOK CONSULTING 250 SE ALLEN ROAD SHELTON WA 985848394	L	GOTV SUPERCARD, POSTAGE (USP S. CAP CITY PRESS)	40,058.98
08/04/2008	MARUSA CHERI PO BOX 433 SOUTH CLE ELUM WA 989430433	B	TRAVEL EXPENSES	1,000.00
08/08/2008	MWP PARTNERS INC PO BOX 30084 SEATTLE WA 981132084	L	PRINTING/DESIGN GOTV PIECES (CAP CITY PRESS, FOR MAILING SERVICE)	82,045.00

Total from attached pages \$ 0.00

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 \$131,489.88

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